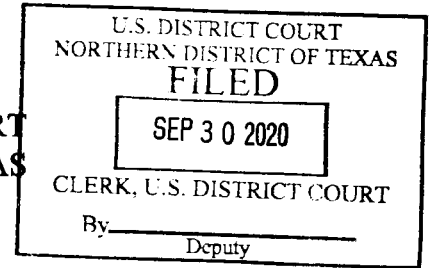


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

SEAN ALEXANDER HARRIS (01)

No. 4:20-MJ-

631

CRIMINAL COMPLAINT

I, Special Agent Duane Vasquez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

Beginning no later than in or around March 09, 2020, and continuing until no earlier than September 21, 2020, in the Fort Worth Division of the Northern District of Texas, **Sean Alexander Harris**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).

1. I am a Special Agent with the U.S. Postal Service (USPS) Office of Inspector General (OIG), and have been so employed for over eighteen years. I am currently assigned to the North Texas Parcel Task Force (NTPTF)/Narcotics Team for the Dallas Field Office in Coppell, TX, and I am responsible for investigating narcotics involving the U.S. Mail. Prior to becoming a Special Agent, I was an Auditor for the USPS Office of Inspector General from August 1999 until September 2002.

2. It is my belief that between no later than March 09, 2020, and continuing until no earlier than September 21, 2020, **Sean Alexander Harris** did conspire with other individuals to possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 846 (Conspiracy to Possess, with Intent to Distribute a controlled Substance in Violation of 21 U.S.C. § 841)

3. Since this affidavit is submitted only for the limited purpose of securing a criminal complaint, I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient in establishing probable cause for the complaint sought. The facts in this affidavit are based on, among other things, my review of evidence and discussions with other law enforcement officers.

PROBABLE CAUSE

4. On or about March 09, 2020, Task Force Officers (TFOs) of the North Texas Parcel Task Force (NTPTF), utilizing postal databases, identified and began investigating numerous suspicious mailings originating from the Dallas – Fort Worth area. The parcels were deemed as characteristic of those containing narcotics and being linked to illegal dark web activity. All the parcels listed a return address of “FOREVER STYLIST INC.” in Lewisville, Texas. Further investigative inquiries established that FOREVER STYLIST INC and the listed address are fictitious.

5. On or about March 13, 2020, TFOs identified one of those mailings and coordinated to intercept the parcel. On March 18, 2020, TFOs obtained and executed a federal search warrant for the parcel, addressed from FOREVER STYLIST INC. to a recipient in Vancouver, WA, which resulted in the seizure of approximately five gross grams of a substance which field-tested positive for methamphetamine.

6. On or about March 18, 2020, TFOs conducted surveillance at the Rowlett Post Office, 3412 Enterprise, Rowlett, TX related to the suspicious mailings by a fictitious business "FOREVER STYLIST INC." On this date, an unknown, white male wearing a leather jacket and spiked bleached hair dropped off a cardboard box and a Walmart grocery bag containing 58 pieces of mail matching the shipper "FOREVER STYLIST INC.," bearing PC Postage permit number C26321. The empty cardboard box was affixed with a shipping label addressed to N.V. for postal supplies shipped to her by the USPS. Review of the mailings disclosed that ten of the fifty Priority Mail envelopes (the other eight were Priority Mail Express envelopes) listed the shipper name "PENNY 4 THOUGHTS," with an address in Balch Springs, TX.

7. On or about March 19, 2020, open source social media review identified N.V.'s Facebook and Instagram accounts. Review of the accounts led to identification of an individual **Sean Harris** (@versacesean) who matched the image of the person mailing parcels at the Rowlett Post Office on March 18, 2020.

8. On April 10, 2020, TFOs conducted surveillance of **Harris**. TFOs observed **Harris** visit the Eagle Postal Center located on W. Green Oaks BLVD in Arlington, TX. TFOs had previously identified a particular mailbox at this location as registered to **Harris**. While at the Eagle Postal Center, **Harris** picked up multiple parcels. One of those parcels, mailed to **Harris** from California, was suspected by TFOs to contain methamphetamine due to characteristics of the parcel consistent with drug parcels. **Harris** then left the Eagle Postal Center and drove directly to a relative's address in Arlington, TX. TFOs observed **Harris** unload a large cardboard box from his vehicle and take it into the apartment. Approximately two hours later, TFOs observed **Harris** load boxes into his vehicle and depart the apartment complex. TFOs maintained surveillance of **Harris** and followed him directly to the Hurst Post Office located at 825 Precinct Line RD, Hurst, TX 76053. TFOs observed **Harris** remove a large cardboard box from his vehicle and enter the post office. TFOs recovered and documented 43 parcels that were mailed by **Harris** at the Hurst Post Office. All the parcels listed a return address of "FOREVER STYLIST INC." with a fictitious Lewisville, TX address. TFOs retained two of the parcels to confirm their contents and returned the remaining parcels to the mail stream. TFOs obtained and executed federal search warrants on both parcels and seized approximately eleven gross grams of a substance consistent with marijuana and approximately eight gross grams of a substance which field-tested positive for methamphetamine from the parcels mailed by **Harris**.


9. On April 10, 2020, TFOs identified another parcel in the mail stream consistent with the parcel **Harris** picked up from the Eagle Postal Center on that same date which was mailed from California. TFOs intercepted the parcel and observed it was addressed to “**Sean Harris**,” at an address in Arlington, TX. TFOs obtained and executed a federal search warrant on the parcel, which resulted in the seizure of approximately 664.27 gross grams of a substance which field-tested positive for methamphetamine. The above evidence was submitted to the DEA lab for testing which revealed an approximate substance purity of 98 percent methamphetamine.

10. On or about July 23, 2020, TFOs completed a review of video surveillance conducted at N.V.’s residence for the period of May 08, 2020 to June 06, 2020. TFOs were monitoring the activities at this address related to **Harris**. Surveillance disclosed that **Harris** was observed on several occasions carrying a brown box and grocery bags from the residence and placing them into his rented vehicle or a white Chrysler 200 registered to N.V. Further review established that **Harris** resided with N.V. at her residence. The brown box and grocery bags seen in the surveillance video were consistent with the items **Harris** was seen carrying when depositing narcotics parcels at the Rowlett Post Office and Hurst Post Office.

11. On or about July 27, 2020, TFOs learned that **Harris** rented a postal mailbox at a UPS Store located on N Central EXPY, in Dallas, TX, which is located within several blocks of N.V.'s residence. The UPS Store confirmed a parcel from California had arrived for **Harris** on this date and that **Harris** had been in to check his mail prior to the parcel arriving that morning. The California parcel **Harris** was expecting was from a known source supplier of methamphetamine identified during the investigation. TFOs learned that **Harris** had received approximately thirteen parcels addressed to "PROTOCOL NETWORKING LIMITED," a business name **Harris** has used to receive parcels shipped via USPS, FedEx, DHL, and UPS.

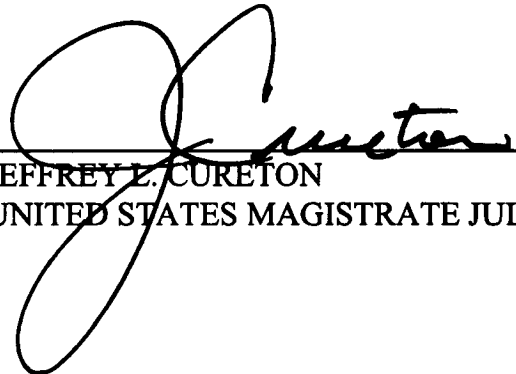
12. Through further investigation, TFOs were able to determine that **Sean Harris** is an individual who has mailed parcels containing narcotics from multiple post offices around the DFW area. To date, mailings associated with the Harris DTO are estimated to be approximately 7,800 items throughout the United States using various fictitious shipper names and addresses.

13. Based upon the foregoing facts and information, I respectfully submit that there is probable cause to believe that **Sean Alexander Harris** did conspire with other individuals to possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 846.



D. Vasquez
Special Agent
USPS Office of Inspector General

Subscribed and sworn to before me on this 30th day of September, 2020, at 10:20
a.m./p.m., in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE